

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

TRUSTEES OF THE NEW YORK CITY DISTRICT COUNCIL OF CARPENTERS PENSION FUND, WELFARE FUND, ANNUITY FUND, and APPRENTICESHIP, JOURNEYMAN RETRAINING, EDUCATIONAL AND INDUSTRY FUND, TRUSTEES OF THE NEW YORK CITY CARPENTERS RELIEF AND CHARITY FUND, and THE CARPENTER CONTRACTOR ALLIANCE OF METROPOLITAN NEW YORK,

20 CV 5867 (VEC)

NOTICE OF MOTION

Plaintiffs,

-against-

NEW YORK MASTCLIMBING LLC, DUNLOP ACCESS SYSTEMS LLC d/b/a DUNLOP MASTCLIMBERS, DUNLOP MASTCLIMBERS, LLC f/k/a DUNLOP WORK PLATFORMS, LLC, DUNLOP MASTCLIMBERS LTD., DUNLOP MASTCLIMBERS LLC,

Defendants.

TO THE CLERK OF THE COURT and COUNSELORS:

PLEASE TAKE NOTICE, that the undersigned, on behalf of Plaintiffs, will move this Court before the Honorable Valerie E. Caproni, United States District Court Judge, at the United States Courthouse, Southern District of New York, located at 40 Foley Square, New York, New York 10007, at a date and time to be determined by the Court, for an Order approving a Consent Judgment and entering judgment against Defendants Dunlop Access Systems LLC d/b/a Dunlop Mastclimbers and Dunlop Mastclimbers LLC, and for such other and further relief as the Court deems proper and just.

Dated: New York, New York
April 22, 2022

Respectfully submitted,

VIRGINIA & AMBINDER, LLP

By: /s/ Adrianna R. Grancio

Adrianna R. Grancio, Esq.
40 Broad Street, 7th Floor
New York, New York 10004
(212) 943-9080
agrancio@vandallp.com
Attorneys for Plaintiffs